

CC Docket No. 94-102 – E911 Interim Report

Filed by: Commnet PCS, Inc.
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Date: July 31, 2003

To: Marlene H. Dortch, Secretary
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By Electronic Submission:

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TIER III CARRIER INTERIM REPORT

CC Docket No. 94-102

Commnet PCS, Inc. ("Commnet PCS") hereby submits its E911 Interim Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket No. 94-102, FCC 02-210, released July 26, 2002 (*Non-Nationwide Carrier E911 Order*), and *Public Notice*, DA 03-2113, released June 30, 2003.

Carrier Identifying Information:

Carrier Name: Commnet PCS, Inc. – FRN 0005-2585-38

E911 Compliance Officer: David Walker
1562 Park Street, Unit E
Castle Rock, CO 80104-3113

E911 Implementation Information:

In February 2003, FCC rules changed, and carriers were given the flexibility to pursue alternative business models. Commnet PCS has moved to an alternative business model, specifically, becoming a "carriers' carrier". Thus, Commnet PCS has no retail business, providing only wholesale service to other carriers. COMMNET PCS THUS HAS NO SUBSCRIBERS AND WILL NOT HAVE ANY SUBSCRIBERS. Based on this premise, Commnet PCS hereby reports as follows:

- ☐ Commnet PCS has received no Phase I requests and no Phase II requests from PSAPs. Commnet PCS has obtained and installed all of the network equipment and software necessary to meet any Phase I request from a PSAP. Commnet PCS is dependent on a landline between the switch and the requesting PSAP for Phase I deployment, and will have to work with the local exchange carrier ("LEC") to have a landline installed when the time comes. Commnet PCS's system operates in rural areas, and it can take a LEC as long as 12 or even 18 months to install a new landline in a rural area. Thus, there is the substantial possibility that a PSAP's request would remain outstanding longer than six months while Commnet PCS awaits the installation of a landline connection to the PSAP.
- ☐ Commnet PCS is employing a handset-based solution for incoming roamers. Commnet PCS is using TDMA technology supplied by Airbiquity. Airbiquity is based in the State of Washington.
- ☐ Commnet PCS intends to serve incoming roamers using a handset-based solution. As such, Commnet PCS has installed all of the necessary network equipment for Phase I E911 deployment. Commnet PCS anticipates a significant problem with its Phase II E911 deployment. Specifically, Commnet PCS elected to use a handset-based solution for its E911 deployment, because it was the only attainable solution, either technically or financially.

Recently, the FCC ruled that Airbiquity, the only vendor of TDMA handset-based solutions, was not offering a Phase II-compliant handset. Now neither Airbiquity nor any other vendor will be supporting a handset-based TDMA solution. Moreover, Commnet PCS is unable to switch to a network-based solution, because it is technically impossible. For a network-based solution to function, a handset must be located within the reliable service area of at least three cell sites simultaneously, in order to triangulate the position of the handset. Commnet PCS operates only in remote, rural areas, where there is little overlap between two cells, and never any overlap among three cells. Therefore, Commnet PCS could never employ a network-based solution.

- ☐ Commnet PCS obtained ALI-capable handsets from Airbiquity prior to the October 1, 2002 deadline, such that they were available if requested. Commnet PCS did not encounter any problems in obtaining or negotiating agreements to obtain these ALI-capable handsets. Commnet PCS added no new subscribers after October 1, 2002. As previously discussed, following the rule change to allow licensees to operate entirely as a “carriers’ carrier”, Commnet PCS went to that business model. Commnet PCS currently has no subscribers, but, rather, serves only the customers of other carriers. Commnet PCS will not have any future subscribers.
- ☐ Commnet PCS does not anticipate that full Phase II service will ever be available in its network, for the reasons discussed above pertaining to the issues with the absence of any available Phase II TDMA handsets and the impossibility of employing a network-based solution, both of which are beyond Commnet PCS’ control. Commnet PCS will be filing a request with the Commission for a permanent waiver of the Phase II requirements in the near future.
- ☐ With regard to meeting the ultimate implementation date of December 31, 2005, see above.